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**Of Attorneys for Plaintiff**

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON

**VAN LOO FIDUCIARY SERVICES LLC, an  
Oregon Limited Liability Corporation, as  
personal representative of the estate of,  
IMMANUEAL JAQUEZ CLARK, deceased,**

Plaintiff,

vs.

**CITY OF PORTLAND, a municipal  
corporation, and CHRISTOPHER  
SATHOFF,**

Defendants.

Case No. 3:24-cv-00430-IM

**JOINT RULE 26(f) CONFERENCE  
REPORT AND LR 16 PROPOSED  
DISCOVERY PLAN**

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 26-1, the parties certify that on April 11, 2024, they held an initial conference of counsel for discovery planning.

1. Initial Disclosures. The parties did not agree to waive initial disclosures. Initial disclosures are due by May 10, 2024.

2. Discovery Plan. The parties stipulate and agree to the following discovery and pre-trial deadlines:

File all pleadings pursuant to Fed. R. Civ. P. 7(a) and 15	January 17, 2025
Join all claims, remedies, and parties pursuant to Fed. R. Civ. P. 18 & 19	January 17, 2025

JOINT RULE 26(f) CONFERENCE REPORT AND LR 16 PROPOSED  
DISCOVERY PLAN - 1  
(Case No. 3:23-cv-01801-AN)

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Complete all fact discovery	February 7, 2025
Expert Disclosure and Reports	March 7, 2025
Rebuttal Expert Disclosures	April 11, 2025
Complete Expert Discovery	May 16, 2025
Dispositive Motions	July 3, 2025
Submit joint ADR report	90 days after the ruling on any dispositive motions

3. The parties do not foresee any major discovery issues that will require the court's attention. There are no significant ESI issues that the parties foresee. The parties have agreed on and will submit a proposed stipulated protective order to protect certain confidential information.

**DATED** this 22<sup>nd</sup> day of April, 2024.

By: /s/ Jesse Merrithew  
**Jesse Merrithew**, OSB No. 074564  
**Of Attorneys for Plaintiff**

By: /s/ Carey Caldwell  
**Carey Caldwell**, OSB No. 093032  
**Of Attorneys for Defendants**